(Official Form 1) (12/02)
FORM B1

United States Bankruptcy Court
Southern District of New York

VOLUNTARY PETITION

Name of Debtor (if individual, enter Last, First, Middle): MICHAEL G. TYSON	Name of Joint Debtor (Spouse) (Last, First, Middle):
All Other Names used by the Debtor in the last 6 years (include married, maiden and trade names): MIKE TYSON	All Other Names used by the Joint Debtor in the last 6 years (include married, maiden and trade names): 03-41900
Soc. Sec./Tax I.D. No. (If more than one, state all): 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	Soc. Sec./Tax I.D. No. (If more than one, state all):
Street Address of Debtor (No. & Street, City, State & Zip Code): c/o Barry Hankerson 155 W. 19th Street New York, NY 10011	Street Address of Joint Debtor (No. & Street, City, State & Zip Code): BK JUDGE GROPPER
County of Residence or of the Principal Place of Business: NEW YORK, NY	County Of Residence or of the Principal Place of Business:
Mailing Address of Debtor (If different from street address):	Mailing Address of Joint Debtor (If different from street address):

Location of Principal Assets of Business Debtor
(If different from street address listed above):

Information Regarding the Debtor (Check the Applicable Boxes)

Venue (Check any applicable box)

☒ Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
☐ There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.

Type Of Debtor (Check all boxes that apply)

☒ Individual(s) ☐ Railroad
☐ Corporation ☐ Stockbroker
☐ Partnership ☐ Commodity Broker
☐ Other ______ ☐ Clearing Bank

Chapter or Section of Bankruptcy Code Under Which the Petition is Filed (Check one box)

☐ Chapter 7 ☒ Chapter 11 ☐ Chapter 13
☐ Chapter 9 ☐ Chapter 12
☐ Sec. 304 - Case ancillary to foreign proceeding

Nature of Debt (Check one box)

☐ Consumer/Non-Business ☒ Business

Filing Fee (Check one box)

☒ Full Filing Fee attached
☐ Filing Fee to be paid in installments. (Applicable to individuals only.) Must attach signed application for the court's consideration certifying that the debtor is unable to pay fee except in installments. Rule 1006(b). See Official Form No. 3

Chapter 11 Small Business (Check all boxes that apply)

☐ Debtor is a small business as defined in 11 U.S.C. § 101
☐ Debtor is and elects to be considered a small business under 11 U.S.C. § 1121(e) (Optional)

Statistical/Administrative Information (Estimates only)

☒ Debtor estimates that funds will be available for distribution to unsecured creditors.
☐ Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.

THIS SPACE FOR COURT USE ONLY

Estimated Number of Creditors	1-15	16-49	50-99	100-199	200-999	1000-over
	☐	☐	☐	☒	☐	☐

	$0 to $50,000	$50,001 to $100,000	$100,001 to $500,000	$500,001 to $1 million	$1,000,001 to $10 million	$10,000,001 to $50 million[1]	$50,000,001 to $100 million	More than $100 million
Estimated Assets	☐	☐	☐	☐	☐	☒	☐	☐
Estimated Debts	☐	☐	☐	☐	☐	☒	☐	☐

[1] Reflects book value of assets and liabilities.

(Official Form 1) (12/02)

Voluntary Petition
(This page must be completed and filed in every case)

Name of Debtor(s): MICHAEL G. TYSON — **FORM B1, Page 2**

Prior Bankruptcy Case Filed Within Last 6 Years (If more than one, attach additional sheet)

Location Where Filed:	Case Number:	Date Filed:

Pending Bankruptcy Case Filed by any Spouse, Partner or Affiliate of this Debtor (If more than one, attach additional sheet)

Name of Debtor: MIKE TYSON ENTERPRISES, INC.	Case Number: AS FILED	Date Filed: CONCURRENTLY
District: SOUTHERN DISTRICT OF NEW YORK	Relationship: AFFILIATE	Judge:

Signatures

Signature(s) of Debtor(s) (Individual/Joint)

I declare under penalty of perjury that the information provided in this petition is true and correct.
[If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12 or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7.

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

Signature of Debtor

Signature of Joint Debtor

Telephone Number (If not represented by attorney)

August 1, 2003
Date

Signature of Attorney

Signature of Attorney(s) for Debtor

DEBRA GRASSGREEN ROBERT FEINSTEIN
Printed Name of Attorney(s) for Debtor(s)

PACHULSKI, STANG, ZIEHL, YOUNG, JONES & WEINTRAUB P.C.
Three Embarcadero Center, Suite 1020
San Francisco, CA 94111
(415) 263-7000
(415) 263-7010 Fax

PACHULSKI, STANG, ZIEHL, YOUNG, JONES & WEINTRAUB P.C.
461 Fifth Avenue
25th Floor
New York, NY 10017
(212) 561-7700
(212) 561-7777 Fax

Signature of Debtor (Corporation/Partnership)

I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

Signature of Authorized Individual

Printed Name of Authorized Individual

Title of Authorized Individual

August , 2003
Date

Exhibit A

(To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15d of the Securities Exchange Act of 1934 and is requesting relief under chapter 11)

☐ Exhibit A is attached and made a part of this petition.

Exhibit B

(To be completed if debtor is an individual whose debts are primarily consumer debts) I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United states code, and have explained the relief available under each such chapter.

Signature of Attorney(s) for Debtor(s) Date

Exhibit C

Does the Debtor own or have possession of any property that poses or is alleged to pose a threat of imminent and identifiable harm to public health or safety?

☐ Yes, and Exhibit C is attached and made a part of this petition

☒ No

Signature of Non-Attorney Petition Preparer

I certify that I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110, that I prepared this document for compensation, and that I have provided the debtor with a copy of this document.

Printed Name of Bankruptcy Petition Preparer

Social Security Number

Address

Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document.

If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.

Signature of Authorized Individual

Date

A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy procedure may result in fines or imprisonment or both 11 U.S.C. § 110; 18 U.S.C. § 156.

Debra I. Grassgreen (CA Bar No. 169978)
Robert J. Feinstein (RF 2836)
Malhar S. Pagay (CA Bar No. 189289)
Maria A. Bove (MB 8687)
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Facsimile: (212) 561-7777

Proposed Attorneys for Debtors and Debtors in Possession

03 AUG -1 PM 10:20
DISTRICT COURT SDNY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MICHAEL G. TYSON, Debtor.	Chapter 11 Case No. 03 - ______ ( )
In re MIKE TYSON ENTERPRISES, INC., Debtor.	Chapter 11 Case No. 03 - ( )

AFFIDAVIT OF MICHAEL G. TYSON
PURSUANT TO LOCAL BANKRUPTCY RULE 1007-2

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

MICHAEL G. TYSON, being duly sworn, deposes and says:

1. I am the President, Secretary, Chief Financial Officer and sole shareholder of Mike Tyson Enterprises, Inc., a California corporation ("MTE"). MTE and I (collectively, the "Debtors") are debtors in possession in the bankruptcy cases captioned above. I am familiar with

the Debtors' business and financial affairs and make the statements contained herein based on my personal knowledge, my review of business records, or upon information and belief. I am authorized to submit this affidavit in support of MTE's petition for relief under chapter 11 of Title 11, United States Code (the "Bankruptcy Code").

2. Unless otherwise indicated, the financial information described in or attached to this Affidavit has not been audited.

3. A description of the nature of my business and a concise statement of the circumstances leading to the filing of the chapter 11 cases (collectively, the "Cases") is set forth below in ¶¶ 20 through 35.

4. Neither of the Cases was commenced originally under either chapter 7 or 13 of the Bankruptcy Code.

5. To the best of my knowledge, information and belief, no informal committee of creditors or other interested parties has been organized prior to the commencement of the Cases.

6. Pursuant to Rule 1007(d) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 1007-2, this Affidavit includes the information set forth below.

7. Attached as **Exhibit "A"** to this Affidavit is a list of the names and addresses and, where available, telephone numbers of the creditors of each Debtor holding the twenty (20) largest unsecured claims, excluding insiders, and the name of the person familiar with the relevant Debtor's account. The list includes the amount of the claim, and, if

appropriate, an indication of whether such claim is contingent, unliquidated, disputed, or partially secured.

8. Attached as **Exhibit "B"** to this Affidavit is a list of the names and addresses of each of the Debtor's five (5) largest secured creditors. The list includes the amount of each claim, a brief description of the claim, an estimate of the value of the collateral securing the claim, and whether the claim or lien is disputed, subject to the relevant Debtor's rights to dispute the actual validity of any claims.

9. My principal assets consist of residential real property and substantial litigation claims, including pending litigation against Don King and affiliated entities seeking millions of dollars in damages. My principal liabilities include estimated tax claims of around $17 million, business and personal expenditures in the aggregate amount of over $10 million and contingent litigation claims asserted by third parties, including litigation filed by Lennox Lewis and his promoter seeking payment of $20 million (the "Lewis Litigation"). MTE's principal assets include miscellaneous receivables and claims against third parties. MTE's principal liabilities consist of business-related expenses, certain tax-related liabilities and the Lewis Litigation.

10. I am the sole shareholder of MTE.

11. To the best of my knowledge, neither MTE nor I has any property that is in the possession or custody of any custodian, public officer, mortgagee, pledgee, assignee of rents, or secured creditor, or agent for any such entity other than perhaps bank accounts which may be subject to claims or setoff and cash collateral held as described in Exhibit "B."

12. At present, neither MTE nor I owns, leases or holds under some other arrangement premises from which MTE or I operate business.

13. My substantial assets are located in New York, New York. My books and records and those of MTE are located at the offices of my personal and business managers in New York, New York and Los Angeles, California. Neither MTE nor I holds assets outside the territorial limits of the United States.

14. To the best of my knowledge, there are no actions or proceedings, pending or threatened, against me or MTE or property belonging to either MTE or me, where a judgment or a seizure of property is imminent.

15. At present, I am the only member of senior management of MTE. However, both MTE and I have retained Neilson Elggren LLP ("Neilsen") as our restructuring/turnaround advisors. A brief summary of their relevant responsibilities and experience is contained in Neilsen's application for employment which is being filed with the Court, contemporaneously herewith.

16. Both MTE and I intend to continue to engage in business.

17. At present, neither I, personally, nor MTE employs any personnel. Accordingly, neither of the Debtors has a payroll to fund.

18. At present, I do not intend to receive any payments from either bankruptcy estate for services for the thirty (30) day period following the filing of its bankruptcy petition. To the extent that, in the future, I seek payment for services rendered to either bankruptcy estate,

I will obtain approval from the Court for compensation. Neilsen's compensation for services during the thirty (30) day period shall be as disclosed in its employment application to this Court.

19. During the thirty (30) period following the filing of the Debtors' petitions, I do not estimate that the estates will receive or disburse any funds, experience any net cash gain or loss or accrue any obligations and obligations remaining unpaid, other than professional fees.

NATURE OF THE DEBTORS' BUSINESSES AND STATEMENT OF CIRCUMSTANCES LEADING TO THE DEBTORS' CHAPTER 11 FILING

Background

20. I am a professional boxer and a former heavyweight champion of the world. I was born on June 30, 1966, in Brooklyn, New York, and began boxing at the age of 13. I was a successful amateur boxer and turned professional on March 6, 1985. By August 1, 1987, I captured the World Boxing Council (WBC), World Boxing Association (WBA) and International Boxing Federation (IBF) heavyweight titles, becoming the undisputed world heavyweight champion.

21. In 1988, I hired boxing promoter Don King (collectively, "King"), and gave King complete control of my professional and business affairs.

22. I defended my titles successfully until February 11, 1990, when James "Buster" Douglas defeated me. I then won four straight bouts and earned the right to challenge for the title of world champion. At that time, my representatives were engaged in discussions for me to fight then title-holder Evander Holyfield on November 8, 1991. However, I was forced to postpone the bout due to an injury. In 1992, before the Holyfield fight could be rescheduled, I was convicted by a jury in Indianapolis, Indiana, of the July 19, 1991, alleged rape of a beauty

pageant contestant. On March 25, 1995, I was released for good behavior after serving only three years of my ten-year sentence.

23. On March 19, 1996, I regained the WBC heavyweight crown and six months later, on September 7, 1996, I recaptured the WBA Heavyweight Championship. On November 9, 1996, I lost to Evander Holyfield. My rematch with Holyfield on June 28, 1997, ended with my disqualification and resulted in the revocation of my license to box, the imposition of a $3 million fine by the Nevada Athletic Commission and the filing of class action lawsuits in New York and Nevada by disgruntled fight viewers.

24. In late 1998, I entered into a Multi-Fight Agreement with Showtime Networks, Inc. ("Showtime"), which provided for the exclusive staging, television production and distribution of no less than five (5) fights, together with undercard events.

25. I returned to boxing on January 16, 1999, and won a succession of matches, but was defeated by Lennox Lewis on June 8, 2002. I defeated Clifford Etienne in a first round knockout on February 22, 2003. I have not boxed since, but intend to do so.

Business Entities

26. On February 20, 1998, MTE was incorporated in the State of California. I own MTE. I have an exclusive employment agreement with MTE. MTE provides my boxing-related services to third parties. I also formed Tyson Records, a California corporation, Tyson Gear, Inc., a Nevada corporation and Mike Tyson Productions, Inc., a Delaware corporation. None of the entities other than MTE is active or presently engaged in business operations.

Events Leading to the Filing of the Chapter 11 Cases

A. Litigation Regarding Breaches of Trust and Fraud Committed by Don King

27. In 1998, I filed a lawsuit (the "King Litigation") in the United States District Court for the Southern District of New York against Don King, Don King Productions, Inc., DKP Corporation and KingVision Pay Per View Ltd. In that lawsuit, I assert that King, among other things, (a) stole and diverted millions of dollars from me; (b) betrayed my trust and abandoned his fiduciary duties by entering into transactions in which my interests were diluted or ignored in favor of his interests; (c) forced me, while in prison, to sign various agreements purporting to grant King and third parties valuable rights without affording me access to independent legal counsel or business advisors; and (d) created a "sham" management team for me, consisting primarily of King's family members, in order to prevent me from seeking legal or business advice that he did not control. Trial in this matter is scheduled to commence in September 2003.

B. Lennox Lewis Lawsuit

28. On or about May 8, 2003, Lennox Lewis and his boxing promoter, Lion Promotions, L.L.C. ("Lion"), sued MTE and me in the Supreme Court of the State of New York and also sued Don King Productions, Inc. and Don King (the "Lewis Litigation"). The Lewis lawsuit accuses me of breaching an alleged agreement to fight Lewis twice, consecutively, for the heavyweight championship. Lewis and Lion also assert that King "commenced a campaign of bribery, lies and even a death threat" to cause me to allegedly breach obligations arising under a settlement of disputes between Lewis and me. Lewis and Lion seek damages in the amount of

$20 million from me and damages of $35 million as well as punitive damages in the amount of $350 million from King.

29. My attorneys have explained to me that, simultaneous with the commencement of the Lewis Litigation, Lewis and Lion moved for an order providing for, among other relief, (a) a pre-trial attachment of any settlement of or judgment in the King Litigation up to $25 million; (b) a temporary restraining order barring the settlement of the King Litigation pending a hearing on the motion; (c) a preliminary injunction precluding the parties to the King Litigation to give Lewis and Lion ten days' notice of any proposed settlement thereof; and (d) certain discovery from third parties. On May 9, 2003, the court entered an Order to Show Case in favor of Lewis and Lion pursuant to which the court temporarily restrained me and King from settling the King Litigation pending a hearing on the motion on May 19, 2003 (the "Lewis TRO").

30. I have also been advised that, on May 14, 2003, the Lewis Litigation was removed to the United States District Court hearing the King Litigation and the Lewis TRO was subsequently vacated as moot. I understand that the Lewis Litigation could go to trial around December 8, 2003.

C. **Tax Claims**

31. I have substantial obligations to the Internal Revenue Service, certain state taxing authorities and the United Kingdom Inland Revenue Service based on fight and other income earned allegedly subject to such jurisdictions and other taxable events. As of July 10, 2003, my estimated aggregate direct and indirect tax liabilities exceeded $17 million.

D. Tyson's Financial Condition and Retention of a Restructuring Manager

32. I have been in financial distress since 1998, when I was burdened with substantial debt to Showtime, taxing authorities and parties to litigation. Since that time, although my fight income, various asset sales and litigation recoveries have enabled me to pay a lot of my debt, I am still unable to pay my bills. I have not fought recently, I have no other income, and I am told that I have non-tax debt of over $10 million in addition to the $17 million in unpaid taxes. I have also incurred high legal costs in connection with the King Litigation and other matters and other personal and business obligations. My tangible assets include two former residences in Las Vegas, Nevada, cars and other property. I no longer live in Nevada. I have spent the most time in the last six (6) months in New York. I believe, however, that I have substantial intangible assets, including claims against Showtime, King and others who are located in New York.

33. In July 2003, after considering various alternatives and consulting with my advisors, I decided that the retention of a restructuring and turnaround manager to help me fix my financial situation and the filing of a bankruptcy case was the best course of action. Accordingly, we retained the services of Neilson Elggren LLP and agreed to file these cases.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of August, 2003.

Michael G. Tyson

Sworn to and Subscribed
before me, a Notary Public of the State
and County aforesaid on this 1st day
of August, 2003.

WANDA FAYE ROBINSON
Commission # 1275592
Notary Public - California
Los Angeles County
My Comm. Expires Sep 1, 2004

Notary Public

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DISTRICT COURT SDNY

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ALL-STATE LEGAL® 800-222-0510

Debra Grassgreen (CA SBN 169978)[1]
Robert J. Feinstein (RF 2836)
Malhar S. Pagay (CA SBN 189289)[1]
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Proposed Attorneys for the Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MICHAEL G. TYSON, Debtor.	Chapter 11 Case No. 03 - ______ ( )

VERIFICATION OF LIST OF CREDITORS
HOLDING 20 LARGEST UNSECURED CLAIMS

I, MICHAEL G. TYSON named as the Debtor in this case, declare under penalty of perjury that I have read the foregoing List of Creditors Holding 20 Largest Unsecured Claims and that it is true and correct to the best of my information and belief.

Dated: August 1, 2003

Signature ______________________
MICHAEL G. TYSON

[1] *Pro Hac Vice* admission pending.

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Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

In re MICHAEL G. TYSON **Case No.** ____________

Debtor

Chapter 11

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

Following is a list of the debtor's creditors holding the 20 largest unsecured claims. The list is prepared in accordance with FED. R. Bankr. P. 1007(d) for the filing in this chapter 11 case. The list does not include (1) persons who come within the definition of "insider" set forth in 11 U.S.C. § 101(30), or (2) secured creditors unless the value of the collateral is such that the unsecured deficiency places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Internal Revenue Service Fresno, CA 93888	Internal Revenue Service Fresno, CA 93888	Taxes				13,368,233.00
Inland Revenue Service Taxes - UK	Inland Revenue Service Taxes - UK	Taxes				4,000,000.00
Ziffren, Brittenham, & Branca 1801 Century Park West Los Angeles, CA 90067	Ziffren, Brittenham, & Branca 1801 Century Park West Los Angeles, CA 90067 (310) 286-9971	Legal Services				382,028.02
USI of Southern California Ins. Services PO Box 9004 Van Nuys, CA 91409	USI of Southern California Ins. Services PO Box 9004 Van Nuys, CA 91409 (818) 704-1000	Insurance				257,555.62
Jewelers, Inc. 2400 Western Avenue Las Vegas, NV 89102	Jewelers, Inc. 2400 Western Avenue Las Vegas, NV 89102 (702) 382-7411	Jewelry				173,706.05

In re: MICHAEL G. TYSON
Debtor

Case No.

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS (Con'td)

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Jimmerson Hansen 415 South Sixth Street Suite 100 Las Vegas, NV 89101	Jimmerson Hansen 415 South Sixth Street Suite 100 Las Vegas, NV 89101 (702) 388-7171 Harriet	Legal Services				130,528.77
Darius Rugs 981 3rd Ave. New York, NY 10022	Darius Rugs 981 3rd Ave. New York, NY 10022 (212) 644-6600	Home Furnishings				78,000.00
Ferrari of Beverly Hills 9375 Wilshire Blvd. Beverly Hills, CA 90212	Ferrari of Beverly Hills 9375 Wilshire Blvd. Beverly Hills, CA 90212 (310) 275-4400	Litigation				60,603.00
E&R Electric, Inc. 5030 W. Oquendo Road Suite 300 Las Vegas, NV 89118	E&R Electric, Inc. 5030 W. Oquendo Road Suite 300 Las Vegas, NV 89118 (702) 877-0105	Home Improvements				54,408.83
Kimberly Scarborough 2700 Arlington Avenue #7B Riverdale, NY 10471	Kimberly Scarborough 2700 Arlington Avenue #7B Riverdale, NY 10471	Debt				51,949.42

In re: MICHAEL G. TYSON
Debtor

Case No.

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS (Con'td)

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Kajan Mather and Barish 9777 Wilshire Boulevard Suite 805 Beverly Hills, CA 90212	Kajan Mather and Barish 9777 Wilshire Boulevard Suite 805 Beverly Hills, CA 90212 (310) 278-6080	Legal Services				45,617.42
Don King 556 E Washington Ste 1501 Las Vegas, NV 88102	Don King 556 E Washington Ste 1501 Las Vegas, NV 88102	Litigation		X	X	Unliquidated
Lennox Lewis c/o Judd Bernstein PC 1790 Broadway New York, NY 10019	Lennox Lewis c/o Judd Bernstein PC 1790 Broadway New York, NY 10019 (212) 974-2400	Litigation		X	X	Unliquidated
Lion Promotions LLC c/o Judd Bernstein PC 1790 Broadway New York, NY 10019	Lion Promotions LLC c/o Judd Bernstein PC 1790 Broadway New York, NY 10019 (212) 974-2400	Litigation		X	X	Unliquidated
Roosevelt McKinley c/o Henry C. Shelton, III, Esq. 80 Monroe Ave., Ste 700 Memphis, TN 38103	Roosevelt McKinley c/o Henry C. Shelton, III, Esq. 80 Monroe Ave., Ste 700 Memphis, TN 38103 (901) 523-8211 Henry C. Shelton, III	Litigation		X	X	Unliquidated

In re: MICHAEL G. TYSON
Debtor

Case No.

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS (Con'td)

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Monica Turner Tyson 8313 Persimmon Tree Road Bethesda, MD 20817	Monica Turner Tyson 8313 Persimmon Tree Road Bethesda, MD 20817	Litigation		X		Unliquidated
Wonda Laquette Graves c/o Raul Lionel Felder 437 Madison Avenue New York, NY 10022	Wonda Laquette Graves c/o Raul Lionel Felder 437 Madison Avenue New York, NY 10022 (212) 832-3939	Litigation		X	X	Unliquidated
Keith Rhodes c/o Joseph . Giaimo, Esq. Giamo & Vreeburg 80-02 Kew Gardens Rd. Kew Gardens, NY 11415	Keith Rhodes c/o Joseph . Giaimo, Esq. Giamo & Vreeburg 80-02 Kew Gardens Rd. Kew Gardens, NY 11415 (718) 261-6200	Litigation		X	X	Unliquidated
Mitch Rose	Mitch Rose	Litigation		X	X	Unliquidated
WBC, Inc.	WBC, Inc.	Litigation		X	X	Unliquidated
		TOTAL				$18,602,630.13

ALL-STATE LEGAL 800-222-0510

EXHIBIT B

CREDITORS HOLDING LARGEST SECURED CLAIMS

The list below pertains to debtor Michael G. Tyson only. To the best of the Debtor's knowledge, no secured claims exist as to debtor Mike Tyson Enterprises, Inc. The list does not include persons who come within the definition of "insider" set forth in 11 U.S.C. § 101. The information herein shall not constitute an admission of liability by, nor is it binding on either Debtor. This list reflects amounts as of June 30, 2003. Both Debtors reserve the right to supplement this disclosure upon further investigation.

Name and Address of Creditor	**Description of Claim**	**Estimated Amount of Claim**	**Estimated Value of Collateral**	**Whether or Not Disputed**
Cendant Mortgage 4001 Leadenhall Road Mount Laurel, NJ 08054	Mortgage: 6740 Tomiyasu Lane Las Vegas, Nevada	$1,000,000.00	$4,000,000.00	No
Cendant Mortage 4001 Leadenhall Road Mount Laurel, NJ 08054	Mortgage: 6760 Tomiyasu Lane Las Vegas, Nevada	$1,000,000.00	$1,000,000.00	No

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Debra Grassgreen (CA SBN 169978)[1]
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Malhar S. Pagay (CA SBN 189289)[1]
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03 AUG -1 PM 10:20
DISTRICT COURT SDNY

Proposed Attorneys for the Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MICHAEL G. TYSON, Debtor.	Chapter 11 Case No. 03 - ______ ( )

VERIFICATION OF CREDITOR MATRIX

I, MICHAEL G. TYSON, named as the debtor in this case, declare under penalty of perjury that I have read the attached Creditor Mailing Matrix, consisting of 21 sheets, and that it is true and correct to the best of my information and belief.

Dated: August 1, 2003

Debtor: ______________________
MICHAEL G. TYSON

[1] *Pro Hac Vice* admission pending.

56999-001\DOCS_SF:31854.1

Michael G. Tyson

3 Suns Enterprises, Inc.
4443 Blackwaters CL
Ellenwood, GA 30294

A 1 Bail Bond Service

Acurid Las Vegas Commercial
8390 S. Fourth St
Henderson, NV 89015

Adonis AutoTransportation
4147 E. Villa Maria Drive
Phoenix, AZ 85032

ADT Security
P.O. Box 96175
Las Vegas, NV 89193

AFTRA
260 Madison Avenue
7th Floor
New York, NY 10016

Al Phillips The Cleaner, Inc.
3250 W. Ali Baba Lane
Suites C-F
Las Vegas, NV 89118

American Leak Protection
6185 Harrison Drive
Las Vegas, NV 89120

April Tyson
4600 St Rt 61
Plymouth, OH 44865

Armstrong Allen PLLC
Henry C. Shelton III
80 Monroe Ave, Ste 700
Memphis, TN 38103

AT&T
P.O. Box 78225
Phoenix, AZ 85062

Baytree Finance Co
9 Market Square Court
Lake Forest, IL 60045

Beatrice Anderson
339 Oak Street
Mount Pocono, PA

Bemers
210 Commerce Street
Glastonbury, CT 06033

Berman and Ely
11693 San Vicente Blvd
Suite 108
Los Angeles, CA 90049

BMW Financial Services
5515 Parkcenter Circle
Dublin, OH 43017

Bobbi's Helping Hand
5355 Moonflower Crt.
Las Vegas, NV 89146

Camp Shane
134 Teatown Road
Croton On Hudson, NY 10520

Cedric Topps
2505 6th Street
Ganena Park, TX 77547

Cendant Mortgage
4001 Leadenhall Road
Mt. Laurel, NJ 08054

Chip-Dales
8705 W. Gilmore Avenue
Las Vegas, NV 89129

City of Pasadena
Parking Citation Section
100 North Garfield Ave #121
Pasadena, CA 91109

Clark County Recorders Office
PO Box 551510
Las Vegas, NV 89155

Clark County Treasurer
500 S Grand Central Pky
P.O. Box 551220
Las Vegas, NV 89155

Connecticut Dept of Revenue
25 Sigourney Street
Hartford, CT 06106

Connecticut Light & Power
P.O. Box 2957
Hartford, CT 06104

Cort Furniture
4950 W. Ray Road
Chandler, AZ 85226

Cox Communications
P.O. Box 6059
Cypress, CA 90630

CWPM LLC
25 Norton Pl.
P.O. Box 415
Plainville, CT 06062

Danley Real Estate Services
4710 N. 16th Street
Suite 104
Phoenix AZ 85016

Darius Rugs
981 3rd Ave.
New York, NY 10022

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5505 Floral Spray
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104 Salisbury Street
Hartford, CT 06112

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Denise Rawless

Rochester, NY 14613

Dept of Social Services
111 Westfall Rd.
Rochester, NY 14620

Desert Valley Pediatrics
P.O. Box 50150
Henderson, NV 89016

DKP Corporation
501 Fairway Dr.
Deerfield, FL 33441

DLC General Contracting, Inc.
12-A Sunset Way
Suite 104
Henderson, NV 89014

DMV Nevada
555 Wright Way
Carson City, NV 889711

Don King Productions
501 Fairway Dr.
Deerfield, FL 33441

Donnell Marrow
274 W. 119th Street #C
New York, NY 10026

Dragga Callahan Hannon
110 North Washington Street
Suite 300
Rockville, Maryland 20850

E&R Electric, Inc.
5030 W. Oquendo Road
Suite 300
Las Vegas, NV 89118

East Ohio Gas Co.
dba Dominion
1201 East 55th Street
Cleveland, OH 44103

Edwin Leishman
6524 Faith Peak Drive
Las Vegas, NV 89108

EM.TV & Merchandising AG
Munchner Strasse 14
D-854774 Unterfohring
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Estes Smith

Farmington Tax Collector
1 Monteith Dr.
Farmington, CT 06032

Ferrari of Beverly Hills
9372 Wilshire BLvd.
Beverly Hills, CA 90212

Fisher Titus Medical Cnt
272 Benedict Ave.
Norwalk, OH 44857

FRCLA

Frechetts Building
Monica Tyson

Global Registry and Management
902 North Alfred Street
West Hollywood, CA 90069

Globe Tire & Motorsports
2450 S. La Cienega Blvd.
Los Angeles, CA 90034

GMC Smart lease
P.O. Box 660314
Dallas, TX 75266

Grace Lutheran Church & School
2930 Valentine Avenue
Bronx, NY 10458

Grand Avenue Pet Center
73-15 Grand Avenue
Maspeth, NY 11378

Green Machine
P.O. Box 336
1345 Blue Hills Avenue
Bloomfield, CT 06002

Green Valley Plumbing
5075 Camaron Street, Ste D
Las Vegas NV 89118

Haddon Hall Enterprises

Rochester, NY 14621

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Home Box Office
Div of Time Warner Ent. Co.

Homecomings Financial Network
PO Box 890036
Dallas, TX 75389

USI of So CA Ins Services
PO Box 9004
Van Nuys, CA 91409

Internal Revenue Service
Holtsville, NY 00501

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2400 Western Avenue
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556 E Washington
Ste 1501
Las Vegas, NV 88102

King World Production Inc
555 E Washington
Ste 1500
Las Vegas, NV 88101

Kingsvision Pay Per View Ltd.
501 Fairway Dr.
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Kroger-Smith Foods
P.O. Box 415000
Nashville, TN 37241

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c/o Judd Bernstein PC
1790 Broadway
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9200 Sunset Boulevard
Suite 1200
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Lion Promotions LLC
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1790 Broadway
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11 Greenway Plaza #3106
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P.O. Box 911541
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c/o So. Nevada Water Auth
1001 S. Valley View Blvd.
Las Vegas, NV 89153

LV Control
595 New London Road
Latham, NY 12110

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3835 S. Jones Blvd. #104
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McCarran International Airport
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Las Vegas, NV 89111

McLean's Environmental Service
3885 S. Decatur Blvd.
Las Vegas, NV 89103

MGM Grand Hotel
Casino & Theme Park
3799 Las Vegas Blvd. South
Las Vegas, NV 89109

MGM Grand Hotel Inc
3799 Las Vegas Blvd. South
Las Vegas, NV 89109

MGM Grand Hotel Las Vegas Inc
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MGM Grand Inc
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Mitchell Green

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4948 E. Tropicana
Las Vegas, NV 89121

MT Pocono Munic. Auth
303 Pocono Blvd.
Mount Pocono, PA 18344

Natie Fears
P.O. Box #459
Tustin, CA 92780

NE Ohio Orthopaedic Assoc

Nevada Power Co
P.O. Box 30086
Reno, NV 89520

New York Commissioner of Labor
40 Rector Street
New York, NY 10006

NYS Tax Commission
Bankruptcy Section
PO Box 5300
Albany, NY 12205

Ohio State Dept of Taxation
Bankruptcy Division
30 E Broad St. 23rd Flr
Colombus, OH 43215

Orkin Exterminating
8390 S. Fourth St
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4989 Peachtreet
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Phyllis C. Polaner

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151 Kalmus Drive, Suite C220
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PO Box 94739
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Las Vegas, NV 89109

R.L. Roper Consultants
Chelsea Room
Atlantic City, NJ

Rainer Wohrle
1860 Mesquite Canyon Drive
Henderson, NV 89012

Rebel Pool Cleaning Serv
7065 W. Ann Road #130-437
Las Vegas, NV 89130

Republic Services, Inc.
770 E. Sahara Ave.
P.O. Box 98508
Las Vegas, NV 89193

Robin Givens
Chelsea Room
Atlantic City, NJ

Robin Givens Productions
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Atlantic City, NJ

Roch Gas & Electric Corp

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Decatur, GA 30034

Ronald Graham
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VPSD
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Fort Lee, NJ 07024

Ruth Roper
Chelsea Room
Atlantic City, NJ

Schulman Rogers Gandal Pordy
11921 Rockville Pike #300
Rockville, Maryland 20852

Screen Actors Guild
PO Box 48970
Los Angeles, CA 90048

Sentek Security
201 N. Concord Exchange
Suite 100
South Saint Paul, MN 55075

Shine and Clean Cleaning
PO Box 331074
West Hartford, CT 06133

Showtime Networks, Inc.
1633 Broadway
New York, NY 10019

Skyview Owners (4 months)
c/o Blue Wood Mgmt Grp
P.O. Box 9316
New York, NY 10087

Smart Home Systems & Theater
P.O. Box 531548
Henderson, NV 89053

SMG
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Memphis, TN 38105

Snet
P.O. Box 1861
New Haven, CT 06508

Solo Mechanical
419 Robbins Avenue
Newington, CT 06111

Sound Solutions
3234 W. Desert Inn Road
Las Vegas, NV 89102

Southwest Gas Corp
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Sprint
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Phoenix, AZ 85062

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Deluth, GA 30096

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56 48th St
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